

REMARKS

Re-examination and reconsideration of the rejections are hereby requested.

Claims 1–15 and 17–20 are pending in the application. Claims 1-14 and 17-20 stand rejected under 35 U.S.C. §102b as being anticipated by McConnell, et al., US Patent No. 6,011,373. Claim 15 stands rejected under 35 U.S.C. §103(a) as being unpatentable over McConnell in view of applicants admission of prior art.

McConnell is directed to a robust vibration suppression method and system that can be used with computer peripherals such as inkjet printers. Although McConnell suggests reducing noise generation in an inkjet printer in the example given at Column 22 referred to by the examiner, McConnell does not disclose selecting a desired trajectory and moving the movable element along a desired trajectory. These material limitations of selecting a desired trajectory and moving the movable element along the desired trajectory are not taught or suggested by McConnell.

In his response to arguments previously submitted by Applicant, the examiner refers to Column 11 at lines 55-65 and Column 13 at lines 45-50 along with Figure 12. The examiner states that input commands taught by McConnell include “desired level of robustness, noise generation potential, and response time.” It is submitted that those kinds of commands are in no way equivalent to “selecting a desired trajectory” that comprises an input in the present invention.

In the Office Action, the examiner contends that the previous response fails to comply with 37 C.F.R. 1.111(b) because they amount to a general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references. It is submitted that the examiner’s position is not well founded. The claims include the limitation of means for selecting a desired trajectory, which means that the electromechanical mechanism moves the movable element along the desired trajectory that can be thought of as a specific position/time relationship. The McConnell et al reference, on the other hand, merely commands a desired level of robustness, noise generation potential and response time. These parameters are merely outcomes of the McConnell

commands. Thus McConnell specifies outcomes such as noise reduction without specifying a desired trajectory that might result in the noise reduction. In contrast, applicant's claimed invention specifies the trajectory itself that can achieve a variety of outcomes. It is again submitted that the examiner is ignoring the material limitation of means for selecting a desired trajectory.

It is noted that Claim 15 depends from independent Claim 1 and is allowable for the reasons discussed above in connection with Claim 1.

It is submitted that the pending claims as amended herein are in condition for allowance and early favorable action is requested.

Respectfully submitted,
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